

## Chariton Valley Telephone Corporation

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## Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2009

Date filed: March 1, 2010

Name of company covered by this certification: Chariton Valley Telephone Corp

Form 499 Filer ID: 807093

Name of signatory: James A. Simon Title of signatory: General Manager

I, James A. Simon, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI. If affirmative: Not applicable

The company has received two customer complaints in the past year concerning the unauthorized release of CPNI. The first complaint received indicated unauthorized employee access to the customer's cell phone information. Upon investigation it was determined that the complaint was founded, however prior to disciplinary action being taken, the employee resigned from the company. The company has not received further complaints from the customer regarding the matter. The second complaint received indicated unauthorized employee access to a customer's e-mail information. Upon investigation, it was determined that this complaint was unfounded.

The company represents and warrants that the above certification is consistent with 47 C.F.R, § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

James A. Simon, General Manager

Attachments:

Accompanying Statement explaining CPNI procedures

## Chariton Valley Telephone Corp. STATEMENT OF COMPLIANCE WITH CPNI 47 U.S.C. §222, and 47 C.F.R. § 64.2001- 64.2011

Chariton Valley Telephone Corp. (CV Telephone) has established operating procedures that ensure compliance with the Federal Communication Commission regulations regarding the protection of consumer proprietary network information (CPNI).

- CV Telephone has implemented internal procedures to educate and train employees about CPNI and the disclosure of CPNI. CV Telephone has established disciplinary procedures for any employee that wrongfully discloses CPNI. We also ensure that our vendors that have access to our customers CPNI are aware of the CPNI rules.
- CV Telephone does not use CPNI without customer notification as set forth by the FCC in 47 U.S.C. §222, and 47 C.F.R. § 64.2001-64.2011. CV Telephone provides either an opt-in notice or an optout notice when appropriate and maintains the customer's choice. Therefore, the customer's approval status can be determined prior to use of CPNI.
- CV Telephone maintains records of its own and its affiliates' sales and marketing campaigns that use its customers' CPNI. Also, CV Telephone maintains records every time third parties are allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used, and what products and services were offered. These records are retained for a period of at least one year.
- CV Telephone requires sales personnel to obtain supervisor approval of all outbound marketing requests for customer approval and maintains records of compliance for at least one year.
- CV Telephone will provide written notice within five business days to the FCC any instance where the opt-out methods do not work properly, to such a degree that the customer's inability to opt-out is more than an anomaly.